

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re: GUIDANT CORP. IMPLANTABLE  
DEFIBRILLATORS PRODUCTS LIABILITY  
LITIGATION

MDL No. 05-1708 (DWF/AJB)

Anthony T. Brown v. Guidant Corp., et al.  
0:07-cv-02172-DWF-AJB

**APPLICATION TO WITHDRAW AS  
COUNSEL OF RECORD**

**This Document Relates to:  
Plaintiff LEONARD WILSON Only**

Pursuant to Rule 83.7(b) of the Local Rules of the United States District Court for the District of Minnesota, counsel of record for Plaintiff Leonard Wilson, Lieff, Cabraser, Heimann & Bernstein, LLP, and all attorneys of record in this matter, seek to withdraw as counsel for Plaintiff Leonard Wilson in this case for the following reason(s):

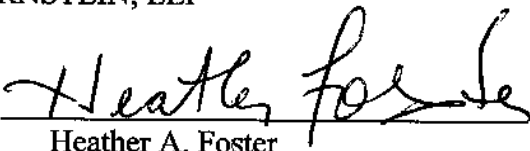
Despite multiple and diligent efforts by counsel to obtain Plaintiff's signed release of the defendant in this matter, Plaintiff refuses to sign the required release. Plaintiff's refusal has created irreconcilable differences with counsel. Plaintiff has advised this firm that will not participate in the settlement and that he will proceed without our representation. Plaintiff has been advised that this firm intends to withdraw from representation.

A copy of this motion and the accompanying Notice of Withdrawal has been served upon Plaintiff at his home address.

Wherefore, Lieff, Cabraser, Heimann & Bernstein and all attorneys of record in this matter request that they be allowed to withdraw as counsel in this matter.

Dated: May 19, 2008

LIEFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP

By:   
Heather A. Foster

Elizabeth J. Cabraser  
Heather A. Foster  
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Counsel for Plaintiff

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This Document Relates to:

**CERTIFICATE OF SERVICE**

Anthony T. Brown v. Guidant Corp., et al.  
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**This Document Relates to:  
Plaintiff LEONARD WILSON Only**

I certify that copies of an Application to Withdraw as Counsel of Record and a Notice of Withdrawal were filed and served on this 19<sup>th</sup> day of May, 2008, on all counsel of record through the Court's ECF service and upon the Plaintiff Leonard Wilson at his last known address of:

Leonard Wilson  
9021 Birchwood Drive  
Twinsburg, OH 44087

Dated: May 19, 2008

LIEFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP

By: Heather A. Foster  
Heather A. Foster

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Counsel for Plaintiff